

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHNNY FLORES,	)	
	)	Case No. 1:23-cv-01736
<i>Plaintiff,</i>	)	
	)	Hon. John J. Tharp, Jr.
v.	)	
	)	Magistrate Jeffrey Cole
REYNALDO GUEVARA, et al.,	)	
	)	<b>JURY TRIAL DEMANDED</b>
<i>Defendants.</i>	)	
	)	
	)	

**DECLARATION OF ETHAN WOODWARD**

I, Ethan Woodward, attest under penalty of perjury that the following is true and correct.

1. My name is Ethan Woodward. I am a paralegal and have been employed with employed with Loevy & Loevy since 2019.
2. I have handled various duties and responsibilities associated with the matter of *Flores v. Guevara*, including locating potential witnesses and working with process servers to serve them with legal documents.
3. In June of 2023, I was asked to determine the current address of SCOTT THURMOND so that he could be served with a deposition subpoena.
4. Defendants' Rule 26(a)(1) disclosure listed a Chicago address for SCOTT THURMOND ([REDACTED]), that was the same address identified in the records from the 1989-1990 police homicide investigation in this case.
5. Using LocatePlus, I found a possible current address for Thurmond in a Chicago suburb ([REDACTED], [REDACTED], Illinois).

6. On June 26, 2023, I contacted Larry Biela of L Biela & Associates Detectives, LTD and sent him a subpoena and cover letter to be served on Mr. Thurmond at that address.

7. Mr. Biela informed me that he visited the address and spoke to the residents: a family with a different last name that reported they did not know Thurmond.

8. Another possible address I found for Mr. Thurmond on LocatePlus was in Colorado ([REDACTED] in [REDACTED]).

9. On July 31, 2023, I contacted Lindsey Paison of Dark Knight Private Investigations in Colorado. I sent her the subpoena and cover letter and instructions to serve Mr. Thurmond at the Colorado address.

10. In early August 2023, Ms. Paison attempted to serve Thurmond in Colorado, including by conducting property and vehicle records searches, and speaking with residents, but was unable to locate Thurmond for service.

11. On August 28, 2023, Defendants sent a Deposition Notice for Mr. Thurmond disclosing a new address for Thurmond in Wisconsin ([REDACTED] [REDACTED]).

12. I then arranged for Loevy & Loevy investigator Mort Smith to effect service of a deposition subpoena on Thurmond at the Wisconsin address, which he did in September 2023.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on December 6, 2023

FURTHER AFFIANT SAYETH NOT

A handwritten signature in dark ink, appearing to read "Ethan Woodward", is written over a light blue grid background.

Ethan Woodward  
Paralegal  
Loevy & Loevy